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Attorneys for Wilmington Savings Fund Society, FSB, Acting Not in its Individual capacity but solely as trustee for SouthSide NSP Trust 2017-6

IN THE MATTER OF:

Adina N. Williams

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 18-24455 JKS

**NOTICE OF OBJECTION**

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Wilmington Savings Fund Society, FSB, Acting Not in its Individual capacity but solely as trustee for SouthSide NSP Trust 2017-6**, the holder of a Mortgage on the debtors' premises at **863 Ternay Avenue Scotch Plains, NJ 07076** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On September 21, 2018, Secured Creditor filed a secured proof of claim for pre-petition arrears in the amount of \$62,345.39.
2. Debtor's plan provides for payment in the amount of \$43,330.00 towards the arrearage claim of the Secured Creditor.
3. The Debtor's plan fails to address the Secured Creditor's claim. The loan modification is remote and speculative. The Debtor cannot modify the loan without the consent of the Secured Creditor. Therefore, the plan cannot be confirmed unless and until a loan modification is agreed to and approved by the Court.
4. Debtor's Plan understates the amount of the Secured Creditor's claim by \$19,015.39, and does not provide sufficient funding to pay said claim.
5. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

**/s/ Denise Carlon, Esquire**

Denise Carlon, Esquire

Attorney for Wilmington Savings Fund Society, FSB, Acting

Not in its Individual capacity but solely as trustee for

SouthSide NSP Trust 2017-6

Dated: DECEMBER 27, 2018